

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MONIQUE KIRTLEY  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261

6 Attorney for Ryan Timothy

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TIMOTHY RYAN,

14 Defendant.

Case No. 2:15-mj-807-GWF

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Brandon C. Jaroch, Assistant United States Attorney, counsel for  
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Monique  
19 Kirtley, Assistant Federal Public Defender, counsel for Timothy Ryan, that the Preliminary  
20 Hearing currently scheduled on Thursday, November 12, 2015 at 4:00 p.m., be vacated and  
21 continued to a date and time convenient to the Court, but no earlier than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Undersigned defense counsel was only recently assigned this case and filed her  
24 notice of appearance on October 30, 2015.
- 25 2. Defendant is detained at Pahrump and defense counsel needs additional time to  
26 schedule a visit to meet with the defendant to discuss the details of this case.

1           3.       The parties have entered negotiations and need the additional time to resolve  
2 this matter.

3           4.       Additionally, denial of this request for continuance could result in a  
4 miscarriage of justice.

5           This is the first request for continuance filed herein.

6           DATED this 3rd of November, 2015

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8           RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

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10          /s/ Monique Kirtley  
By \_\_\_\_\_  
11          MONIQUE KIRTLEY  
12          Assistant Federal Public Defender

/s/ Brandon C. Jaroch  
By \_\_\_\_\_  
BRANDON C. JAROCH  
Assistant United States Attorney

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3 **UNITED STATES DISTRICT COURT**  
4 **DISTRICT OF NEVADA**

5 UNITED STATES OF AMERICA,

6 Plaintiff,

7 v.

8 TIMOTHY RYAN,

9 Defendant.  
10

Case No. 2:15-mj-807-GWF

**ORDER**

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12 Based on the Stipulation of counsel and good cause appearing,

13 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
14 November 12, 2015 at the hour of 4:00 p.m., be vacated and continued to December 14, 2015  
15 at the hour of 4:00 p.m.

16 DATED this 3rd of November, 2015

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19 UNITED STATES MAGISTRATE JUDGE  
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